

U.S. Department of Justice

Washington, DC 20530

**Registration Statement****Pursuant to the Foreign Agents Registration Act of  
1938, as amended****I-REGISTRANT****1. Name of Registrant**

Dentons US LLP

**2. Registration No. (To Be Assigned By the FARA Registration Unit)**

6284

**3. Principal Business Address**

1301 K Street NW, Suite 600

Washington, DC 20006

**4. If the registrant is an individual, furnish the following information:**

(a) Residence address(es)

(b) Other business address(es), if any

(c) Nationality

(d) Year of birth

(e) Present citizenship

(f) If present citizenship not acquired by birth, state when, where and how acquired

(g) Occupation

**5. If the registrant is not an individual, furnish the following information:**(a) Type of organization: Committee ☐ Association ☐ Partnership ☒ Voluntary group ☐Corporation ☐

Other (specify) \_\_\_\_\_

(b) Date and place of organization 7/1/2003 - Delaware

(c) Address of principal office 233 S. Wacker Drive, Suite 7800  
Chicago, IL 60606

(d) Name of person in charge David Tafuri

(e) Locations of branch or local offices 1301 K Street NW, Suite 600  
Washington, DC 20006

(f) If a membership organization, give number of members n/a

(g) List all partners, officers, directors or persons performing the functions of an officer or director of the registrant.

Name	Residence Address(es)	Position	Nationality
See attached			

(h) Which of the above named persons renders services directly in furtherance of the interests of any of the foreign principals?

None

(i) Describe the nature of the registrant's regular business or activity.

Provision of Legal Services

(j) Give a complete statement of the ownership and control of the registrant.

The Limited Liability Partnership (LLP) is owned and controlled by the partners of the LLP.

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6. List all employees who render services to the registrant directly in furtherance of the interests of any of the foreign principals in other than a clerical, secretarial, or in a related or similar capacity.

Name	Residence Address(es)	Nature of Services
David Tafuri	1504 26th Street, NW Washington, DC 20007	Lobbying
Alexander Lurie	3827 Garfield Street, NW Washington, DC 20007	Lobbying
Jasmine Zaki	2201 L Street, NW #102 Washington, DC 20037	Lobbying

**II--FOREIGN PRINCIPAL**

7. List every foreign principal<sup>1</sup> for whom the registrant is acting or has agreed to act.

Foreign Principal

The Kurdistan Regional Government

Principal Address(es)

1) Erbil, Iraq; and

2) 1532 16th Street NW

Washington, DC 20036

**III--ACTIVITIES**

8. In addition to the activities described in any Exhibit B to this statement, will you engage or are you engaging now in activity on your own behalf which benefits any or all of your foreign principals? Yes ☐ No ☒

If yes, describe fully.

**IV--FINANCIAL INFORMATION**

9. (a) **RECEIPTS-MONIES**

During the period beginning 60 days prior to the date of your obligation to register<sup>2</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 any contribution, income, or money either as compensation or for disbursement or otherwise? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each such foreign principal an account of such monies.<sup>3</sup>

Foreign Principal	Date Received	Purpose	Amount
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Total

<sup>1</sup> The term "foreign principal," as defined in Section 1(b) of the Act, includes a foreign government, foreign political party, foreign organization, foreign individual and, for the purpose of registration, an organization or an individual any of whose activities are directly or indirectly supervised, directed, controlled, financed, or subsidized in whole or in major part by a foreign government, foreign political party, foreign organization or foreign individual.

<sup>2</sup> An agent must register within ten days of becoming an agent, and before acting as such.

<sup>3</sup> A registrant is required to file an Exhibit D if he collects or receives contributions, loans, moneys, or other things of value for a foreign principal, as part of a fundraising campaign. There is no printed form for this exhibit. (See Rule 201(e), 28 C.F.R. § 5.201(e)).

**(b) RECEIPTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>4</sup> to the time of filing this statement, did you receive from any foreign principal named in Item 7 anything of value<sup>5</sup> other than money, either as compensation, or for disbursement, or otherwise? Yes ☐ No ☒

If yes, furnish the following information:

Foreign Principal	Date Received	Thing of Value	Purpose
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**10. (a) DISBURSEMENT-MONIES**

During the period beginning 60 days prior to the date of your obligation to register<sup>6</sup> to the time of filing this statement, did you spend or disburse any money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☐ No ☒

If yes, set forth below in the required detail and separately for each such foreign principal named including monies transmitted, if any, to each foreign principal.

Date	To Whom	Purpose	Amount
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**(b) DISBURSEMENTS-THINGS OF VALUE**

During the period beginning 60 days prior to the date of your obligation to register<sup>7</sup> to the time of filing this statement, did you dispose of any thing of value<sup>8</sup> other than money in furtherance of or in connection with your activities on behalf of any foreign principal named in Item 7? Yes ☐ No ☒

If yes, furnish the following information:

Date	Recipient	Foreign Principal	Thing of Value	Purpose
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**(c) DISBURSEMENTS-POLITICAL CONTRIBUTIONS**

During the period beginning 60 days prior to the date of your obligation to register<sup>9</sup> to the time of filing this statement, did you, the registrant, or any short form registrant, make any contribution of money or other thing of value from your own funds and on your own behalf in connection with an election to any political office or in connection with any primary election, convention, or caucus held to select candidates for any political office? Yes ☐ No ☒

If yes, furnish the following information:

Date	Amount or Thing of Value	Political Organization or Candidate	Location of Event
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4, 6, 7 and 9 See Footnote 2, on page 3.

5 and 8 Things of value include but are not limited to gifts, interest free loans, expense free travel, favored stock purchases, exclusive rights, favored treatment over competitors, "kickbacks", and the like.

**V-INFORMATIONAL MATERIALS<sup>10</sup>**

11. Will the activities of the registrant on behalf of any foreign principal include the preparation or dissemination of informational materials? Yes ☒ No ☐

IF YES, RESPOND TO THE REMAINING ITEMS IN THIS SECTION V.

12. Identify each such foreign principal.

The Kurdistan Regional Government

13. Has a budget been established or specified sum of money allocated to finance your activities in preparing or disseminating informational materials? Yes ☐ No ☒

If yes, identify each such foreign principal, specify amount and for what period of time.

14. Will any public relations firms or publicity agents participate in the preparation or dissemination of such informational materials?

Yes ☒ No ☐

If yes, furnish the names and addresses of such persons or firms.

This is merely a possibility. No firms or agents have been considered or contacted regarding such participation.

15. Activities in preparing or disseminating informational materials will include the use of the following:

- ☒ Radio or TV broadcasts      ☒ Magazine or newspaper      ☒ Motion picture films      ☒ Letters or telegrams  
☒ Advertising campaigns      ☒ Press releases      ☒ Pamphlets or other publications      ☒ Lectures or speeches  
☐ Other (specify) \_\_\_\_\_

**Electronic Communications**

- ☒ Email  
☐ Website URL(s): \_\_\_\_\_  
☐ Social media website URL(s): \_\_\_\_\_  
☐ Other (specify) \_\_\_\_\_

16. Informational materials will be disseminated among the following groups:

- ☒ Public officials      ☒ Civic groups or associations  
☒ Legislators      ☒ Libraries  
☒ Government agencies      ☒ Educational groups  
☒ Newspapers      ☒ Nationality groups  
☒ Editors      ☐ Other (specify) \_\_\_\_\_

17. Indicate language to be used in the informational materials:

☒ English      ☐ Other (specify) \_\_\_\_\_

<sup>10</sup> The term informational materials includes any oral, visual, graphic, written, or pictorial information or matter of any kind, including that published by means of advertising, books, periodicals, newspapers, lectures, broadcasts, motion pictures, or any means or instrumentality of interstate or foreign commerce or otherwise. Informational materials disseminated by an agent of a foreign principal as part of an activity in itself exempt from registration, or an activity which by itself would not require registration, need not be filed pursuant to Section 4(b) of the Act.

**VI-EXHIBITS AND ATTACHMENTS**

18. (a) The following described exhibits shall be filed with an initial registration statement:

- Exhibit A-* This exhibit, which is filed on Form NSD-3, sets forth the information required to be disclosed concerning each foreign principal named in Item 7.
- Exhibit B-* This exhibit, which is filed on Form NSD-4, sets forth the information concerning the agreement or understanding between the registrant and the foreign principal.
- (b) An Exhibit C shall be filed when applicable. This exhibit, for which no printed form is provided, consists of a true copy of the charter, articles of incorporation, association, constitution, and bylaws of a registrant that is an organization. A waiver of the requirement to file an Exhibit C may be obtained for good cause shown upon written application to the Assistant Attorney General, National Security Division, U.S. Department of Justice, Washington, DC 20530. (See Rule 201(c) and (d)).
- (c) An Exhibit D shall be filed when applicable. This exhibit, for which no printed form is provided, sets forth an account of money collected or received as a result of a fundraising campaign and transmitted for a foreign principal. (See Rule 201 (e)).

**VII-EXECUTION**

In accordance with 28 U.S.C. § 1746, the undersigned swear(s) or affirm(s) under penalty of perjury that he/she has (they have) read the information set forth in this registration statement and the attached exhibits and that he/she is (they are) familiar with the contents thereof and that such contents are in their entirety true and accurate to the best of his/her (their) knowledge and belief, except that the undersigned make(s) no representation as to truth or accuracy of the information contained in the attached Short Form Registration Statement(s), if any, insofar as such information is not within his/her (their) personal knowledge.

(Date of signature)

(Print or type name under each signature or provide electronic signature<sup>11</sup>)

March 19, 2015

/s/ Michael Zolandz

eSigned

<sup>11</sup> This statement shall be signed by the individual agent, if the registrant is an individual, or by a majority of those partners, officers, directors or persons performing similar functions, if the registrant is an organization, except that the organization can, by power of attorney, authorize one or more individuals to execute this statement on its behalf.

**ARTICLE 6. MANAGEMENT OF THE PARTNERSHIP.**

**6.1. Authority of the US Board.**

**6.1.1. General Authority.** Recognizing the importance and urgency of efficiently operating and managing the Business of the Partnership, the parties hereto expressly understand, acknowledge and agree, and do hereby expressly delegate to the US Board, all power and authority with respect to the operation and management of the Partnership not expressly reserved to the Partners for those matters requiring a vote of the Partners pursuant to this Agreement.

**6.1.2. Specific Authority.** Without limiting the generality of Section 6.1.1, or any other power or authority specifically set forth elsewhere in this Agreement, the power and authority vested in and delegated to the US Board includes the power to (i) determine all Partner Compensation (except in connection with the vote for admission of Partners pursuant to Section 4.3), (ii) modify (with the consent of the affected Partner) the terms and conditions under which said Partner is eligible to receive Retirement Benefits as a Deferred Vested Beneficiary (including the amount of such Retirement Benefits but not the timing of payment of such Retirement Benefits) where said Partner's status is changed, (iii) select, remove, and define the duties and authorities of the Chief Executive Officer, the Managing Partner, the Senior Partner, the General Counsel, the Secretary, and such other officers or positions as the US Board may determine from time to time, (iv) adopt and modify from time to time Partnership Policies, (v) open new non-Threshold Offices and close existing non-Threshold Offices, and (vi) make decisions on behalf of the Partnership with respect to its relationship with the Group and its members.

**6.1.3. Supervisory Authority and Partnership Policies.** The US Board shall have supervisory authority over the conduct and activities of all Partners with respect to or affecting the Business or the affairs or reputation of the Partnership, or over any activity that the US Board deems to be detrimental to or in the best interests of the Partnership, and may from time to time adopt Partnership Policies relating thereto.

FINAL APPROVED PA EFFECTIVE JANUARY 1, 2015

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6.1.4. Limitation of Authority: The US Board shall have no authority to take any action contrary to any vote of the Partners in accordance with this Agreement, or with respect to any matter requiring a vote of the Partners pursuant to this Agreement unless the Partners have voted affirmatively with respect thereto in accordance with this Agreement. The Partners hereby expressly reserve the right to modify, expand or limit the authority and powers delegated to the US Board pursuant to their right to amend this Agreement pursuant to Section 5.4.4.



Question 5(g): List of all partners performing the functions of an officer or director of the registrant.

Name	Address 1	Address 2	City	State	Postal	Position	Nationality
Andrew, Joseph J	11509 Dahlia Terrace		Potomac	MD	20854	Partner	US
Barbe, Jana Cohen	1942 N. Maud Street		Chicago	IL	60611	Partner	US
Barr, Michael H.	177 Ninth Avenue	#PH2H	New York	NY	10011	Partner	US
Baysinger, Kara	23 Craig Avenue		Piedmont	CA	94611	Partner	US
Cocci, Meghan	12971 East Cibola Road		Scottsdale	AZ	85259	Partner	US
Froy, Michael M.	296 Prospect Avenue		Highland Park	IL	60035	Partner	US
Hall, David S.	3 Haig Drive		Dix Hills	NY	11746	Partner	US
Hanson Jr., Robert E.	1210 Strathmore Lane		Southlake	TX	76092	Partner	US
Heidenreich, Roger K.	9885 Conway Road		St. Louis	MO	63124	Partner	US
Hill Jr., Stephen L.	10108 Meadowlake Circle		Liberty	MO	64068	Partner	US
Kudenholt, Stephen S.	298 Brookside Road		Darien	CT	06820	Partner	US
Martin, Sonia R.	24 Dearborn Street		San Francisco	CA	94110	Partner	US
McNamara, Michael T.	4822 Drummond Avenue		Chevy Chase	MD	20815	Partner	US
Moore, C. Michael	2209 Creekside Circle N.		Irving	TX	75063	Partner	US
Portnoy, Elliot I.	6921 Armat Drive		Bethesda	MD	20817	Partner	US
Spears, Natalie J.	1248 W. Granville		Chicago	IL	60660	Partner	US
Vobornik, Donna J.	333 Elizabeth Trail		Oak Park	IL	60302	Partner	US
Weinreich, Gadi	1820 47th Place NW		Washington	DC	20007	Partner	US
Wilson, Mary G.	2836 N. Burling	#1	Chicago	IL	60657	Partner	US
Wolfson, Peter D.	77 Soundview Avenue		White Plains	NY	10606	Partner	US